

Konrad L. Trope, Esq. SBN 133214
Novo Law Group, P.C.
 4631 Teller Avenue, Suite 140
 Newport Beach, California 92660
 (949) 222-0899 (tel)
 (949) 222-0983 (fax)

Attorneys for Plaintiff Pacific Information Resources, Inc.

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

Pacific Information Resources, Inc., a
 California Corporation,

Plaintiff,

vs.

SIMPLE COMMUNICATIONS, an Alabama
 corporation; WILLIAM TRAVIS SULLIVAN,
 individually, AND DOES 1 through 100,
 inclusive, WHOSE IDENTITIES ARE
 UNKNOWN,

Defendants.

CASE NO. CV-07-4131 MMC

**[Before the Honorable Maxine M.
 Chesney, Courtroom 7]**

**PLAINTIFF'S REQUEST TO
 CONTINUE DATE FOR FILING
 MOTION FOR DEFAULT JUDGMENT
 AGAINST WILLIAM TRAVIS
 SULLIVAN AND SIMPLE
 COMMUNICATIONS**

Complaint Filed: August 9, 2007
 Discovery Cut-Off: N/A
 Trial: N/A
 Status Conference: February 8, 2008

**TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR
 ATTORNEYS OF RECORD HEREIN:**

Plaintiff Pacific Information Resources, Inc. ("Plaintiff") hereby requests a continuance
 of the Court to file its Default Judgment Application on February 15, 2008 instead of on
 February 1, 2008. Plaintiff makes this request on the basis of good cause:

1
Request to Continue Date for Filing Motion for Default Judgment

Case No. CV-07-4131

pacific information resources\pleadings\sullivan and simple communications\req to cont date for def judg final as filed 01 31 08

1. Plaintiff is filing two Motion for Summary Judgment Opposition Briefs tomorrow in this same court on the Main Action (Pacific Information Resources v Musselman, Case No. 06-2306 MMC;
2. Plaintiff is filing two Motions for Summary Judgment next week in the Main Action (Pacific Information Resources v Musselman, Case No. 06-2306 MMC;
3. Extrapolating the voluminous data necessary to support the Default Judgement which will be in excess of \$3 million has taken much, much more time than anticipated; and
4. One of Plaintiff's experts, Professor Ran Hadas, is teaching and researching at the University of Sydney in Australia until July, 2008. Thus, coordinating with Professor Hadas has been an extremely time consuming and logistical challenge.

Plaintiff assures the Court there will be no further requests for a continuance of this matter.

There will be no prejudice to any party who has direct or related interest in this case, including those parties who are Defendants in the related case noted herein.

Plaintiff humbly requests this final extension in order to properly comply with all statutory and local criteria for granting the Default Judgment Application.

Respectfully submitted,

DATED: January 31, 2008

NOVO LAW GROUP, P.C.

BY: /s/Konrad L. Trope, Esq.
California State Bar No. 133214
Novo Law Group, P.C.
4631 Teller Avenue, Ste 140
Newport Beach, California 92660
Telephone: (949) 222-0899
Facsimile: (949) 222-0983
E-mail: ktrope@novolaw.com
Attorneys for Plaintiff PACIFIC
INFORMATION RESOURCES,
INC.

[PROPOSED] ORDER

Plaintiff Pacific Information Resources has hereby requested continuance to file its Defaults Judgment Application against Defendants William Travis Sullivan and Simple Communications to February 15, 2008.

Having considered the requested extension, good cause appearing, therefore, and no prejudice any parties appearing, IT IS HEREBY ORDERED that:

Plaintiff shall file its Application for Default Judgment not later than February 15, 2008

Dated: _____

Honorable MAXINE M. CHESNEY
United States District Judge

PROOF OF SERVICE

I am employed in the County of Orange, State of California in the office of a member of the Bar of this Court at whose direction this service was made. I am over the age of 18 and not a party to the within action; my business address is: **4631 Teller Avenue, Suite 140, Newport Beach, California 92660.**

On **January 31, 2008**, I served the foregoing document described as:

**REQUEST TO CONTINUE DATE FOR FILING MOTION FOR
DEFAULT JUDGMENT AGAINST WILLIAM TRAVIS SULLIVAN AND
SIMPLE COMMUNICATIONS**

on the interested parties in this action by placing ☐ the original ☒ a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

XX BY MAIL: I deposited such envelope in the mail at Newport Beach, California. The envelope was mailed with postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the United States Postal Service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one (1) day after date of deposit for mailing in affidavit.

BY PERSONAL SERVICE: I caused such envelope to be delivered by hand to the addressee at the address on the attached Mailing List.

BY FEDEX: I deposited such envelopes at Irvine, California for collection and delivery by Federal Express with delivery fees paid or provided for in accordance with ordinary business practices. I am "readily familiar" with the firm's practice of collection and processing packages for overnight delivery by Federal Express. They are deposited with a facility regularly maintained by Federal Express for receipt on the same day in the ordinary course of business.

BY FACSIMILE: I transmitted the foregoing document by facsimile to the party(s) identified above by using the facsimile number(s) indicated. Said transmission(s) were verified as complete and without error.

BY INTERNET/E-MAIL: I transmitted the foregoing document by e-mail to the party(s) identified above by using the Internet Protocol Addresses indicated. Said transmission(s) were verified as complete and without error.

BY INTERNET/E-MAIL WITH CLERK OF THE COURT: I certify that on 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing as indicated on the attached Mailing List.

I certify and declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **January 31, 2008**, at Newport Beach, California.

/s/
Nancy Hagan

SERVICE LIST:

Pacific Information Resources v Simple Communications, et. al.
Case No. C-07-4131 MMC

VIA U.S. MAIL

William Travis Sullivan
4931 Mason Road
Clayton, Washington 99110

Simple Communications
4931 Mason Road
Clayton, Washington 99110

Simple Communications
701 22nd Avenue
Tuscaloosa, Alabama 35401